

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KIRK E. BINTZLER (09138-089),)	
)	
Petitioner,)	No. 08 C 1293
)	
v.)	
)	
UNITED STATES PAROLE COMMISSION,)	Judge Kendall
)	
Respondent.)	

**UNITED STATES' MOTION FOR ADDITIONAL
TIME TO FILE RESPONSE TO WRIT OF HABEAS CORPUS**

The United States of America, by Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, on behalf of respondent United States Parole Commission, moves for 14 days additional time, or until June 6, 2008, to file its response to petitioner's writ of habeas corpus. In support, the United States avers:

1. The Parole Commission's response to petitioner's writ of habeas corpus is due the court on or before May 23, 2008. Dkt. Rpt. No. 14.
2. The undersigned was assigned this case on May 13, 2008, and must coordinate the government's response with the General Counsel of the Parole Commission. To that end, the pleadings, docket report and the court's order of May 2, 2008, have been sent this day to the General Counsel.
3. The undersigned will be on official travel status May 19 through May 23, 2008, and will be unable to receive mail from the Parole Commission. Therefore, additional time for preparation of the government's response is necessary.

4. The government has not previously moved for additional time in this case. In addition, it is unlikely that petitioner will experience undue prejudice if the court grants the government's motion.

5. Counsel for the government is unable to contact the petitioner as he is incarcerated; therefore, the government cannot comply with the court's standing order regarding counsel's responsibility to discuss the subject matter of a motion for additional time with opposing counsel.

WHEREFORE, for the reasons stated, the United States moves for 14 days additional time, or until June 6, 2008, to file the government's response to petitioner's writ of habeas corpus.

Respectfully submitted,

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Date: May 15, 2008

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